

EXHIBIT B

BLOOD HURST & O' REARDON, LLP

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12 Attorneys for Plaintiffs
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14 **UNITED STATES DISTRICT COURT**
 15 **CENTRAL DISTRICT OF CALIFORNIA**

16 ZURICH AMERICAN INSURANCE
 17 COMPANY; AMERICAN
 18 GUARANTEE AND LIABILITY
 19 INSURANCE COMPANY;
 20 AMERICAN ZURICH INSURANCE
 21 COMPANY; EMPIRE FIRE AND
 22 MARINE INSURANCE COMPANY;
 23 EMPIRE INDEMNITY INSURANCE
 24 COMPANY; UNIVERSAL
 25 UNDERWRITERS INSURANCE
 26 COMPANY; UNIVERSAL
 27 UNDERWRITERS OF TEXAS
 28 INSURANCE COMPANY; ZURICH
 AMERICAN INSURANCE
 COMPANY OF ILLINOIS; COUNTRY
 PREFERRED INSURANCE
 COMPANY; COUNTRY CASUALTY
 INSURANCE COMPANY; COUNTRY
 MUTUAL INSURANCE COMPANY;
 MADISON MUTUAL INSURANCE
 COMPANY; FEDERATED MUTUAL
 INSURANCE COMPANY;
 FEDERATED SERVICE INSURANCE
 COMPANY; FEDERATED RESERVE
 INSURANCE COMPANY; ARIZONA

Case No.

**AFFIDAVIT OF TIMOTHY G.
 BLOOD PURSUANT TO
 CALIFORNIA CIVIL CODE
 § 1780(d)**

DEMAND FOR JURY TRIAL

BLOOD HURST & O' REARDON, LLP

1 AUTOMOBILE INSURANCE
 2 COMPANY; CENTURY SURETY
 3 COMPANY; CELINA MUTUAL
 4 INSURANCE COMPANY; MIAMI
 5 MUTUAL INSURANCE COMPANY;
 6 NATIONAL MUTUAL INSURANCE
 7 COMPANY; FRANKENMUTH
 8 INSURANCE COMPANY;
 9 GOODVILLE MUTUAL CASUALTY
 10 COMPANY; MMG INSURANCE
 11 COMPANY; KEY INSURANCE
 12 COMPANY; FARM BUREAU
 13 GENERAL INSURANCE COMPANY
 14 OF MICHIGAN; 360 INSURANCE
 15 COMPANY; MOUNTAIN WEST
 16 FARM BUREAU MUTUAL
 17 INSURANCE COMPANY; BATTLE
 18 CREEK MUTUAL INSURANCE
 19 COMPANY; NODAK INSURANCE
 20 COMPANY; GOAUTO INSURANCE
 21 COMPANY; AMERICAN WEST
 22 INSURANCE COMPANY; PIONEER
 23 STATE MUTUAL INSURANCE
 24 COMPANY; WAYNE MUTUAL
 25 INSURANCE COMPANY; NEVADA
 26 GENERAL INSURANCE COMPANY;
 27 WOLVERINE MUTUAL
 28 INSURANCE COMPANY;
 LEMONADE INSURANCE
 COMPANY; METROMILE
 INSURANCE COMPANY; AUTO-
 OWNERS INSURANCE COMPANY;
 HOME-OWNERS INSURANCE
 COMPANY; OWNERS INSURANCE
 COMPANY; SOUTHERN-OWNERS
 INSURANCE COMPANY;
 PROPERTY-OWNERS INSURANCE
 COMPANY; FARM BUREAU
 PROPERTY & CASUALTY
 INSURANCE COMPANY; WESTERN
 AGRICULTURAL INSURANCE
 COMPANY; SECURA INSURANCE
 COMPANY (f/k/a SECURA
 INSURANCE, A MUTUAL
 COMPANY); SECURA SUPREME
 INSURANCE COMPANY; ILLINOIS
 CASUALTY COMPANY;
 PHARMACISTS MUTUAL
 INSURANCE COMPANY; WEST
 BEND INSURANCE COMPANY;
 SHELTER MUTUAL INSURANCE
 COMPANY; SHELTER GENERAL
 INSURANCE COMPANY,

Plaintiffs.

BLOOD HURST & O' REARDON, LLP

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v.
KIA AMERICA, INC.; and HYUNDAI
MOTOR AMERICA,
Defendants.

BLOOD HURST & O' REARDON, LLP

1 I, TIMOTHY G. BLOOD, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the
3 State of California. I am the managing partner of the law firm of Blood Hurst &
4 O'Reardon LLP, one of the counsel of record for plaintiffs in the above-entitled
5 action.

6 2. Defendant Kia America, Inc. ("Kia") has done and is doing business in
7 Orange County, California. Such businesses include marketing, advertising,
8 distributing, and selling and leasing, through its authorized dealers and distributors,
9 the Kia automobiles at issue in this lawsuit. Its headquarters are also located in Orange
10 County, California.

11 2. Defendant Hyundai Motor America ("Hyundai") has done and is doing
12 business in Orange County, California. Such businesses include marketing,
13 advertising, distributing, and selling and leasing, through its authorized dealers and
14 distributors, the Hyundai automobiles at issue in this lawsuit. Its headquarters are also
15 located in Orange County, California.

16 I declare under penalty of perjury under the laws of the State of California that
17 the foregoing is true and correct. Executed on June 14, 2023, at San Diego, California.
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19 By: s/ Timothy G. Blood
20 TIMOTHY G. BLOOD
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